
EXHIBIT 3

RACHEL APPLGATE, PH.D.

July 28, 2023

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION
CASE NO. 6:21-cv-00727-ADA

THE TRUSTEES OF PURDUE UNIVERSITY,)
)
 Plaintiff,)
)
 -vs-)
)
 STMICROELECTRONICS INTERNATIONAL)
 N.V., ET AL.,)
)
 Defendants.)

The videotaped deposition upon oral examination of RACHEL APPLGATE, PH.D., a witness produced and sworn before me, Dianne Lockhart, RMR, CRR, a Notary Public in and for the County of Marion, State of Indiana, taken on behalf of the Defendants STMicroelectronics, Inc. and STMicroelectronics International N.V. at the Conrad Hotel Indianapolis, 50 West Washington Street, Indianapolis, Marion County, Indiana, on the 28th day of July, 2023, commencing at 9:32 a.m. pursuant to the Federal Rules of Civil Procedure.

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1 yesterday; right?

2 **A Yes.**

3 Q Do you recall there being discussion during that
4 deposition of leader -- leader information and
5 control number information?

6 MR. BETTINGER: Object to the form of the
7 question. She's not a percipient witness. I
8 mean, the deposition speaks for itself, Counsel,
9 for goodness sakes.

10 MR. OFFOR: Your objection is noted.

11 Q You can answer the question.

12 **A I -- I remember stuff about -- I remember lengthy**
13 **stuff about the leader. Control number may have**
14 **been mentioned. I don't remember a lot about it.**

15 Q And let me take this kind of a different way. In
16 your field --

17 **A Yes.**

18 Q -- if you are asked to retrieve a record --

19 **A Yes.**

20 Q -- would it be acceptable -- would it be your
21 practice to omit or include required parts of the
22 record?

23 **A I would supply the entire record that I was asked**
24 **for. I wouldn't -- I would supply the whole**
25 **thing. If I'm asked for a MARC record, I'd start**

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1 with the first required field of that record and
2 then go to the end.

3 Q And would -- is that a practice that you think
4 would be unique to you or that would be common to
5 others in your field?

6 MR. BETTINGER: Objection. Calls for
7 speculation.

8 A My field says you figure out what the user wants
9 and you give them what you want, and if you're
10 confused, you ask them, but you don't make
11 decisions for the user about what to omit or not.

12 Q You do -- you have experience in accreditation?

13 A Uh-huh.

14 Q Can you explain to us what -- what that means?

15 A So I'm experienced in two levels of it. One is
16 the Higher Learning Commission accredits
17 institutions as a whole in mostly the Midwest,
18 and it's -- it's very large. And so we go and we
19 view things --

20 Q And just a second. The Higher Learning Committee
21 of -- of what?

22 A Commission.

23 MR. BETTINGER: Usually you let a witness
24 finish an answer before you ask something else.

25 MR. OFFOR: You're right, and I apologize

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1 STATE OF INDIANA)
2) SS:
3 COUNTY OF MARION)

4 I, Dianne Lockhart, RMR, CRR, a Notary Public in
5 and for the County of Marion, State of Indiana at
6 large, do hereby certify that RACHEL APPLGATE,
7 PH.D., the deponent herein, was by me first duly
8 sworn to tell the truth, the whole truth, and nothing
9 but the truth in the above-captioned cause.

10 That the foregoing deposition was taken on
11 behalf of the Defendants STMicroelectronics, Inc. and
12 STMicroelectronics International N.V. at the Conrad
13 Hotel Indianapolis, 50 West Washington Street,
14 Indianapolis, Marion County, Indiana, on the 28th day
15 of July, 2023, pursuant to the Applicable Rules.

16 That said deposition was taken down in
17 stenograph notes and afterwards reduced to
18 typewriting under my direction, and that the
19 typewritten transcript is a true record of the
20 testimony given by said deponent; and thereafter
21 presented to said deponent for their signature.

22 That the parties were represented by their
23 aforementioned counsel.

24 I do further certify that I am a disinterested
25 person in this cause of action; that I am not a
relative or attorney of either party, or otherwise

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1 interested in the event of this action, and am not in
2 the employ of the attorneys for either party.

3 IN WITNESS WHEREOF, I have hereunto set my hand
4 and affixed my notarial seal this 1st day of
5 August, 2023.

6
7
8

Dianne Lockhart, RMR, CRR
Notary Public

9
10 Commission Number NP0668781

11 My Commission Expires:
12 June 4, 2031